Defence Sector Financing Statement

Alpha Bank recognizes the role of defence activities that comply with international humanitarian law and contribute to Europe's security. This framework relates specifically to conventional defence financing. The Bank finances lawful, conventional defence activities, in full alignment with international treaties, European regulations, the Financial Action Task Force (FATF) Recommendations, and the principles of responsible banking, while strictly excluding those linked to prohibited, nuclear or controversial weapons, human rights violations, or breaches of international sanctions. In doing so, Alpha Bank supports collective security while applying robust ESG and financial crime risk management, including risks related to proliferation financing.

Alpha Bank's Defence Sector Financing Policy provides the overarching framework for this approach. It applies to the Bank and all Group Companies, in Greece and abroad, and governs all financing activities related to the defence sector. The Policy sets clear boundaries by defining eligible conventional defence activities and prohibiting involvement in weapons systems or practices banned under international conventions[1], as well as with entities subject to EU and UN sanctions regimes.

The Policy is aligned with the Bank's broader Sustainability and Responsible Banking commitments and incorporates comprehensive ESG, reputational, and financial crime risk controls—such as enhanced due diligence, end-use verification, and ongoing monitoring—to ensure compliance with international treaties, export-control requirements, and responsible banking standards. It operates within the Bank's defined risk appetite and governance framework.

The Bank's Board of Directors has approved the selective financing of the Defence sector, subject to the framework incorporated into the Defense Sector Financing Policy. The Policy is updated by the competent Business Area, reviewed at least annually to reflect evolving regulatory and market developments, and submitted to the Credit Risk Committee for approval. Any amendment related to the Financing and Exclusion Criteria must be formally approved by the Bank's Board of Directors. This governance process ensures that the Policy continues to reflect the Bank's highest standards of ethical

[1] For the purposes of this Policy, prohibited, nuclear or controversial weapons systems are defined by reference to applicable international conventions and regulatory frameworks including: the 1972 Biological and Toxin Weapons Convention (BTWC); the 1993 Chemical Weapons Convention (CWC); the 1997 Ottawa Convention on Anti-Personnel Mines (Ottawa Convention); the 2008 Convention on Cluster Munitions (CCM); Protocols III and IV to the Convention on Certain Conventional Weapons (CCW); Regulation (EU) 2019/125; and the Treaty on the Non-Proliferation of Nuclear Weapons (NPT).

conduct, prudent risk management, and long-standing sustainability commitments.

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